



March 11, 2024

Hon. Valerie Figueredo, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Rodriguez et al v. City of New York, et. al., 21-cv-10815 (PKC)

Dear Judge Figueredo:

As the Court may recall, I am co-counsel for Plaintiff in the case above. As the Court may also recall, Cornell law students Jianing Zhao (Ms. Zhao; she/her) and Reed Herter (Mx. Herter; they/them) are both working on this case as part of their clinical education.

This letter is to ask that the Court allow those law students — under my supervision — to take a speaking role at the conference on the various discovery issues raised or crystallized in ECF No. 83. Specifically, Ms. Zhao would be prepared to speak to the HIPAA/160.50 (ECF No. 83 at 16-17) and “unsubstantiated” complaint (*id.* at 17-18) issues, and Mx. Herter would be prepared to speak to the vagueness objections on Interrogatories 8 and 10 (*id.* at 2-3) and Document Request 38 (*id.* at 6). While the Court’s rules do not specifically provide for law student opportunities,¹ as it would be with a “junior attorney,”² I would argue the other issues and be supervising Ms. Zhao and Mx. Herter — and prepared to answer any questions they are not prepared for.

Ms. Zhao and Mx. Herter have asked me to thank the Court for the opportunity, and I, of course, echo the sentiment. As ever, we thank the Court for its time and attention.

Respectfully submitted,

/s/

J. Remy Grfeen
Honorific / Pronouns: Mx. / they, their, them
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¹ Cf. e.g., [Individual Practices of the Hon. M.J. James R. Cho](#) at 1 (Sep. 7, 2023) (“the Court encourages opportunities for law students and junior attorneys to appear and argue in Court accompanied and supervised by a more experienced attorney”).

² [Individual Practices of the Hon. M.J. Valerie Figueredo](#) § III(d) (Apr. 25, 2022).



cc:

All relevant parties by electronic filing.

COHEN & GREEN

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